



## ENZYMATIC THERAPY INCORPORATED

*What **Better** feels like.™*

### INTEGRATIVE THERAPEUTICS INC.™

NF Formulas + PhytoPharmica  
Tyler Encapsulations + Vitaline Formulas

9755 SW Commerce Circle, Suite B2  
Wilsonville, OR 97070  
P: 503.582.8386 + F: 503.582.0467

### ENZYMATIC THERAPY™

&  
**PHYTOPHARMICA™**

825 Challenger Drive, Green Bay, WI 54311-8328  
P: 920.469.1313 + F: 888.570.6460 (Enzymatic)  
P: 920.469.9099 + F: 920.469.4418 (Phyto)

October 20, 2004

Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 810  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

PRODUCT NAME	CLAIM	DISCLAIMER
Glyco-Kinetic™ Complex	Comprehensive supplement for nutritional support of glucose metabolism.*	Vitamin C (Ascorbic Acid), Thiamine (as Thiamine HCl), Riboflavin, Niacin (as Niacinamide and Niacinol™), Vitamin B-6 (as Pyridoxine HCl), Folic Acid, Vitamin B-12 (as Adenosylcobalamin), Pantothenic Acid (as Calcium Pantothenate), Zinc (as Zinc Picolinate), Selenium (as a Selenium Aspartate Complex), Manganese (as Manganese Aspartate), Chromium (from GlucoChrome™), Pectin, Bitter Melon Fruit (Momordica charantia), Holy Basil Leaf Extract (Ocimum sanctum), L-Methionine, L-Alanine, Glycine, Choline (as Choline Bitartrate), Adrenal Powder (Freeze Dried, Bovine), Liver Powder (Freeze Dried, Bovine), Pancreas Powder (Freeze Dried, Bovine), Dandelion Root (Taraxacum officinale), Licorice Root (Glycyrrhiza glabra), L-Glutathione, Reduced, Celandine Aerial Parts Extract (Chelidonium majus)

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I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

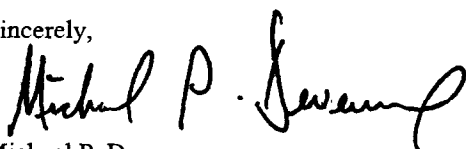
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 10/20/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,



Michael P. Devereux  
Chief Financial Officer